JEFFREY R. ALBREGTS, ESQ. 1 Nevada Bar No. 0066 KRISTA N. ALBREGTS, ESO. 2 Nevada Bar No. 13301 701 Shadow Lane, Suite 150 Las Vegas, Nevada 89106 Tele.: 702/483-5026; Fax.: 702/485-2343 Email: jalbregts@albregtslaw.com Attorneys for TPP Alan and Theresa Lahrs 6 UNITED STATES DISTRICT COURT 7 DISTRICT OF NEVADA 8 9 THE BANK OF NEW YORK MELLON FKA CASE NO. 2:17-cv-01033-JCM-EJY THE BANK OF NEW YORK, AS TRUSTEE 10 FOR THE CERTIFICATEHOLDERS OF 11 CWALT, INC., ALTERNATIVE LOAN SECOND STIPULATION AND PROPOSED ORDER EXTENDING TRUST 2005-56, MORTGAGE 12 THIRD-PARTY PLAINTIFFS **PASSTHROUGH** LAHRS' TIME TO FILE REPLY TO CERTIFICATES, SERIES 2005-56, 13 THIRD PARTY DEFENDANTS COMMONWEALTH LAND TITLE Plaintiff, 14 INSURANCE COMPANY'S AND LAWYERS TITLE OF NEVADA, VS. 15 INC'S FIRST AMENDED ANSWER AND COUNTERCLAIM [ECF 143] CHRISTOPHER COMMUNITIES AT 16 SOUTHERN HIGHLANDS GOLF CLUB 17 HOMEOWNERS ASSOCIATION; KUPPERLIN LAW GROUP, LLC; FIRST 100, 18 LLC; ALAN LAHRS AND THERESA LAHRS AS TRUSTEES OF THE LAHRS FAMILY 19 TRUST; DOE INDIVIDUALS I-X, inclusive; 20 and ROE CORPORATIONS I-X, inclusive, 21 Defendants. 22 CHRISTOPHER COMMUNITIES AT 23 SOUTHERN HIGLANDS GOLF CLUB HOA, 24 Cross-Claimant, 25 KUPPERLIN LAWGROUP, LLC, 26 Cross-Defendant. 27 28

SECOND STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 1

1	CHRISTOPHER COMMUNITIES AT SOUTHERN HIGHLANDS GOLF CLUB HOA
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3	Cross-Claimant, vs.
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5	KUPPERLIN LAW GROUP, LLC,
6	Cross-Defendant.
7	KUPPERLIN LAW GROUP, LLC,
8	Counter-Claimant,
9	VS.
10	NATALIE L. WINSLOW, an individual,
11	Counter-Defendant.
12	ALAN LAHRS AND THERESA LAHRS
13	AS TRUSTEES OF THE LAHRS FAMILY
14	TRUST, a trust established under the laws of the State of Nevada,
15	Cross-Claimant,
16	Vs.
17	CHRISTOPHER COMMUNITIES AT
18	SOUTHERN HIGHLANDS GOLF CLUB HOA, a homeowner's association governed by
19	the laws of the State of Nevada; KUPPERLIN
20	LAW GROUP, LLC, a Nevada limited liability company; FIRST 100, LLC, a Nevada limited
21	liability company,
22	Cross-Defendants.
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SECOND STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 2

1	ALAN LAHRS AND THERESA LAHRS AS TRUSTEES OF THE LAHRS FAMILY
2	TRUST, a trust established under the laws of the
	State of Nevada,
3	Third-Party Plaintiff,
4	Tillid-Farty Flamidii,
5	
6	JAY BLOOM, an individual, DOE
0	INDIVIDUALS I-X, inclusive;
7	and ROE CORPORATIONS I-X, inclusive,
8	Third-Party Defendants.
9	ALAN LAHRS AND THERESA LAHRS,
	Individually and as TRUSTEES OF THE
10	LAHRS FAMILY TRUST,
11	
12	Third-Party Plaintiffs,
,,	Ws.
13	COMMONWEALTH LAND TITLE
14	INSURANCE COMPANY, a Foreign
15	Corporation previously registered with the
	Nevada State Secretary of State's Office;
16	LAWYERS TITLE OF NEVADA, Inc., a Nevada Domestic Corporation; DOE individuals
17	I-V; and ROE CORPORATIONS I-V,
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	Supplemental Third-Party Defendants.
19	SECON
20	SECON STIPULATION AND PROPOSED ORD
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## N AND PROPOSED ORDER EXTENDING THIRD-PARTY PLAINTIFFS LAHRS' TIME TO FILE REPLY TO DEFENDANTS COMMONWEALTH LAND TITLE INSURANCE COMPANY AND LAWYERS TITLE OF NEVADA, INC FIRST AMENDED ANSWER AND COUNTERCLAIM

It is hereby Stipulated and Agreed by and between Jeffrey R. Albregts, Esq., counsel for Third-Party Plaintiffs, individually and as Trustees for their Family Trust ("Lahrs"); and Defendants Commonwealth Land Title Insurance Company and Lawyers Title of Nevada, Inc. ("Commonwealth"), by and through their counsel of record, Sophia S. Lau, Esq., and Christopher Ritter, Esq., that Lahrs' deadline to file a Reply to Commonwealth's and Lawyers

SECOND STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 3

1	Title of Nevada, Inc's First Amended Answer an	d Counterclaim [ECF 143] should be extended
2	from August 16, 2019 to and including Tuesday.	, September 2, 2019.
3	DATED this 14th day of August, 2019.	
4	, ,	JEFFREY R. ALBREGTS, LLC
5		/s/ Jeffrey R. Albregts
6		
7		Jeffrey R. Albregts, Esq., NSB 0066 JEFFREY R. ALBREGTS, LLC
8		701 Shadow Lane, Suite 150
9		Las Vegas, Nevada 89106 Telephone: 702/483-5026
10		Facsimile: 702/485-2343
11		Email: jalbregts@albregtslaw.com Attorneys for Third Party Plaintiffs Lahrs
12	DATED this 14th day of August, 2019.	
13		EARLY SULLIVAN WRIGHT GIZER & McRAE, LLP
14		/s/ Christopher I. Ritter
15		Sophia S. Lau, Esq., NSB 13365
16		8716 Spanish Ridge Avenue, Suite 105
17		Las Vegas, NV 89148 Telephone: 702/331-7593
18		Facsimile: 702/331-1652
19		Christopher I. Ritter, Esq.
20		Early Sullivan Wright Gizer & McRae, LLP
21		6420 Wilshire Blvd, 17th Floor
22		Los Angeles, CA 90048
23		Attorneys for Defendants Commonwealth And Lawyers Title of Nevada, Inc.
24	IT IS SO ORDERED:	
25	2 ,00 ,0	
26	UNITED STATES MAGISTRATE JUDGE	August 15, 2019 Dated:
27	ONITE OF STATES WAS STATE JUDGE	Dateu.
28		
	SECOND STIPULATION/ORDER EXTENDING TIME FO LAHRS TO FILE REPLY TO COMMONWEALTH/LAWY	

TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 4

## **CERTIFICATE OF SERVICE**

1		
2		ertify that on behalf of Jeffrey R. Albregts, LLC, bove and foregoing document entitled <b>SECOND</b>
3	STIPULATION AND PROPOSED ORDI	ER EXTENDING TPP LAHRS' TIME TO
4	FILE REPLY TO TPD COMMONWEALT INC'S FIRST AMENDED ANSWER AND	TH'S AND LAWYERS TITLE OF NEVADA, COUNTERCLAIM, to be served as follows:
5	57	l (the contraction of the contraction with the date
6	and time of the electronic service	igh court's electronic filing system, with the date substituted for the date and place of
7	deposit in the mail; and/or	
8	Sean L. Anderson, Esq.	Robert E. Atkinson, Esq.
9	J. Tyler King	Atkinson Law Associates, Ltd. 376 E. Warm Springs Road,
10	2525 Box Canyon Drive Las Vegas, Nevada 89128	Suite 130
	Attorneys for Christopher Communities	Las Vegas, Nevada 89119
11	at Southern Highlands Golf Club HOA	Attorney for Kupperlin Law Group, LLC
12	Sanderson@lkglawfirm.com Tking@lkglawfirm.com	Email: <u>Robert@nv-lawfirm.com</u>
13		
14	Darren T. Brenner, Esq.	John T. Steffan, Esq.
15	Rex Garner, Esq.	Todd W. Prall, Esq.
16	Akerman LLP 1160 Town Center Drive, Suite 330	Hutchison & Steffen, PLLC 10080 West Alta Drive, Suite 200
16	Las Vegas, NV 89144	Las Vegas, NV 89145
17	Attorneys for Plaintiff	Attorneys for Lahrs/Lahrs Family Trust
18	Email: <u>Darren.brenner@akerman.com</u> Email: <u>Rex.garner@akerman.com</u>	Email: <u>Tprall@hutchlegal.com</u>
19		Sophia S. Lau, Esq., NSB No. 13365
20	Joseph Gutierrez, Esq.	Early Sullivan Wright Gizer & McRae, LLP
	Daniel Barraza, Esq. Maier Gutierrez & Associates	8716 Spanish Ridge Avenue, Suite 105 Las Vegas, NV 89148
21	8816 Spanish Ridge Ave.	Email: Slau@earlysullivan.com
22	Las Vegas, NV 89148	Chairteach and Ditter Fran
23	Attorneys for Bloom & First 100, LLC Email: jag@mgalaw.com	Christopher I. Ritter, Esq. Early Sullivan Wright Gizer & McRae, LLP
24	Email: djb@mgalaw.com	6420 Wilshire Blvd, 17 <sup>th</sup> Floor
		Los Angeles, CA 90048
25		Email: <a href="mailto:critter@earlySullivan.com">critter@earlySullivan.com</a> <a href="mailto:Attorneys for Commonwealth/Lawyers Title">Attorneys for Commonwealth/Lawyers Title</a>
26		The may got Common reason Darryon I mee
27		/s/ Heather Stroup

For Jeffery Albregts, LLC

SECOND STIPULATION/ORDER EXTENDING TIME FOR LAHRS TO FILE REPLY TO COMMONWEALTH/LAWYERS TITLE'S FIRST AMENDED ANSWER/COUNTERCLAIM - 5

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